



Terry Tamminen
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

Edwin F. Lowry, Director
700 Heinz Avenue, Suite 200
Berkeley, California 94710-2721

N00221_003621
MARE ISLAND
SSIC NO. 5090.3.A



Arnold Schwarzenegger
Governor

June 23, 2004

Southwest Division
Naval Facilities Engineering Command
Attn: Mr Jerry Dunaway
1220 Pacific Highway
San Diego, California 92132-5190

Dear Mr. Dunaway:

Navy Mare Remedial Investigation, IR Site 17 and Building 503 Area, Investigation Area A1, Draft Final, dated 12/12/02

Navy Mare Feasibility Study, IR Site 17 and Building 503 Area, Investigation Area A1, Draft, dated 1/03

The Department of Toxic Substances Control has completed a limited review of the subject documents. The attached comments are forwarded to you for your consideration.

Should you have any questions regarding this letter, please call me at (510) 540-3773.

Sincerely,

Chip Gribble
Remedial Project Manager
Base Closure Unit
Office of Military Facilities

Attachment

cc: Mr. Gary Riley
Ms. Emily Roth
Mr. Mark Kleiner

DTSC Partial Comments on the Navy Mare Island Remedial Investigation, IR Site 17 and Building 503 Area, Investigation Area A1, Draft Final, dated 12/12/02

1. The risk assessment as presented is unacceptable. EPA has commented on the risk assessment and DTSC is substantially in agreement with the EPA comments. Further, there are significant outstanding concerns regarding the nature and extent of contamination. It appears likely that the LNAPL contamination is considerably more extensive than that presented, and the extent of needed remediation or excavation is likely to be greater as well. Without defined cleanup levels and based on risk, a remediation end point is not clearly defined. Consequently, we are concerned that remediation proposed in the FS would leave significant contamination in place.

EPA has recommended that, alternatively, an interim measure of a removal action be conducted. We strongly suggest that a removal action, followed by a revised RI, be considered.

2. Given that significant contamination is still present at the site, and that the contamination still represents an undefined and unquantified risk, site control should be present to restrict public access. A site perimeter control fence with signage should be installed at the earliest opportunity.